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February 8, 1996

**BY HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW - Room 222  
Washington, DC 20554

**Re: CC Docket No. 92-297  
Ex Parte Presentation**

Dear Mr. Caton:

On behalf of GE American Communications, Inc., enclosed please find an original plus four copies of a letter that was delivered today to Mr. Thomas Tycz of the Satellite and Radiocommunication Division and to other Commission representatives as indicated.

Direct any questions concerning this matter to the undersigned.

Respectfully submitted,



Karis A. Hastings

Counsel for GE American  
Communications, Inc.

KAH/vjs  
Enclosures

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February 8, 1996

*BY HAND DELIVERY*

Mr. Thomas S. Tycz  
Chief, Satellite and Radiocommunication Division  
Federal Communications Commission  
2000 M Street NW - Room 811  
Washington DC 20554

**Re: CC Docket No. 92-297  
28 GHz Spectrum Plan**

Dear Mr. Tycz:

GE American Communications, Inc. ("GE Americom") strongly supports the sharing proposal between GSO/FSS systems and the feeder links for TRW's Odyssey system that was presented at the status conference earlier this week. As we indicated in that meeting, the proposal represents a reasonable compromise that forms the basis for the Commission to move ahead with Option 2, 2A, or 2B.

We reemphasize that Option 3 is completely unacceptable. As we have repeatedly stated in our submissions in this proceeding, 1000 MHz of Ka-band spectrum represents the absolute minimum necessary for GSO/FSS operations. Option 3 simply does not provide enough spectrum for GSO/FSS systems such as the one proposed by GE Americom. As a result, that approach would jeopardize the value of the investments that GE Americom and other GSO/FSS applicants have made in designing and developing Ka-band proposals. The fact that Options 2, 2A and 2B satisfy our minimum spectrum requirements is critical to our support of those plans.

The sharing agreement represents a delicate balance that was reached based on concessions on the part of both GSO/FSS operators and TRW. In addition,

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the parties also took into account the positions of other parties. Like Hughes, we do not believe that Teledesic has justified its opposition to Option 2B, given its previous statements regarding the feasibility of spectrum sharing between gigalink terminals and LMDS operations.<sup>1</sup>

The sharing proposal is, however, limited explicitly to the Odyssey system. It can be used as a framework for exploring coordination solutions with other future NGSO/MSS systems. But the Iridium system's parameters are very different from those of Odyssey, so the agreement with TRW does not permit GSO/FSS providers to share with Iridium.

Finally, the sharing arrangement requires that the spectrum for GSO/FSS downlinks be separated from NGSO/MSS downlink spectrum. We support designating the 17.7-18.55 GHz band (which is associated with the spectrum proposed to be allocated to LMDS) for GSO/FSS downlinks.

We urge the Commission to build on the efforts of GSO/FSS applicants and TRW to arrive at a solution to difficult interference issues by implementing a band sharing plan based on that agreement. For these reasons, we ask the Commission to move ahead with a Ka-band solution based on Option 2, 2A or 2B.

Respectfully submitted,



Peter A. Rohrbach  
Karis A. Hastings

Counsel for GE American  
Communications, Inc.

KAH/vjs

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<sup>1</sup> See Letter of John Janka to Thomas Tycz dated February 7, 1996.

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ccs: Donald Gips  
Robert James  
Karl Kensinger  
Susan Magnotti  
Michael Marcus  
Robert Pepper  
Harry Ng  
Jennifer Gilsenan  
Gregory Rosston  
David Wye